



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

2016 JUN 24 9:30 AM  
COMMISSION

**SENSITIVE**

**MEMORANDUM**

**TO:** The Commission

**FROM:** Kathleen Guith *KG*  
Acting Associate General Counsel for Enforcement

Stephen A. Gura *SG*  
Deputy Associate General Counsel for Enforcement

**BY:** Mark Allen *MA*  
Assistant General Counsel

Delbert K. Rigsby *DKR*  
Attorney

**SUBJECT:** MURs 6978 and 7054 (Oakland County Democratic Party) - Pre-Probable Cause Conciliation Agreement

In MUR 6978, the Commission found reason to believe that Oakland County Democratic Party ("Committee") violated 52 U.S.C. §§ 30102(c), 30102(h)(1) and 30104(b), and 11 C.F.R. § 106.7(d)(1), and approved a conciliation agreement

1. In MUR 7054, the Commission found reason to believe that the Committee violated 52 U.S.C. § 30104(b), and approved a conciliation agreement

2. In the First General Counsel's Report for MUR 7054, we informed the Commission that we intended to honor the Committee's request to negotiate a single conciliation agreement covering both matters.<sup>3</sup>

<sup>1</sup> See Amended Certification in MUR 6978 (November 23, 2015).  
<sup>2</sup> See Certification in MUR 7054 (April 28, 2016).  
<sup>3</sup> See First General Counsel's Report in MUR 7054 at 7, 8.

1           We recommend that the Commission accept the signed conciliation agreement with the  
2 Committee and close the files in MUR 6978 and MUR 7054.

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4 **RECOMMENDATIONS:**

- 5  
6           1. Accept the attached conciliation agreement with Oakland County Democratic Party  
7           and Phillip W. Reid in his official capacity as treasurer.  
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9           2. Approve the appropriate letter.  
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11           3. Close the file in MUR 6978  
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13           4. Close the file in MUR 7054.  
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